

1 gone out there.

2 Q I accept that. I still want to know how you --
3 how you or -- and if Mr. Hutton can shed some light on this, I
4 encourage him to do so. How do we know that you were on
5 Update 1, Update 2, these particular Nation's Updates?

6 A Um-hum.

7 MR. BECHTEL: Do you know?

8 MR. HUTTON: No, I don't.

9 MR. BECHTEL: I'm speaking to Mr. Hutton.

10 MR. HUTTON: I didn't compile this.

11 MR. BECHTEL: I understand that. But the
12 witness was asked to subscribe to these. And but for the --
13 the way the record came out, these were his -- these were his
14 public service announcements.

15 MR. HUTTON: Well - - -

16 MR. BECHTEL: The point I'm making is, and then
17 I'll move on, that I don't think -- I don't think this witness
18 can say that. I appreciate he can say that he's done public
19 service announcements, and I applaud the station for doing
20 that, and so on. I just -- I just will be challenging in
21 Washington the efficacy of these particular sheets, pages in
22 the exhibit.

23 MR. HUTTON: Go ahead.

24 THE WITNESS: If I could?

25 BY MR. BECHTEL:

1 Q Go ahead.

2 A I keep meticulous records and I have all my
3 calendars from day one.

4 Q Wow.

5 A Oh, yes. And I keep them and I've kept them
6 all. I could go back. And I can tell you that I know what --
7 we would have filmed a PSA and then it would have been played
8 numerous times once we filmed it. And that's what this would
9 have referred to. Because I would go out there and film it,
10 and then they would plug it in at various times during various
11 days - - -

12 Q Right.

13 A - - - of their video -- their time. And that's
14 what we did. So if -- if I did one or two in April of '94, in
15 May of '94 or June of '94, and that's what this reflects
16 (indicating), then they would have played them over numerous
17 times. Because we cut the tape once, and sometimes if it
18 didn't take good we'd do it a second time and then we'd replay
19 it, we'd look at it, yeah, it's a go and then they'd start to
20 play it on the TV station. So that's what that would refer
21 to, the various dates that that would have been shown over on
22 that particular announcement.

23 Q And when you say you cut the public service
24 announcement tape - - -

25 A Yes, sir.

1 Q - - - was this at the station?

2 A At their station, yes.

3 Q This was not in Harrisburg?

4 A Oh, no, no, no. These PSAs would have been done
5 out there at the station. That I vividly remember, going out
6 there and doing those with a certain producer.

7 Q Tell me again the nature of the message on these
8 PSAs.

9 A They would be public service type announcements.
10 I can recall that we had mentioned -- I think there was the --
11 there was a WIC announcement the one time, about WIC, Women,
12 Infants and Children, and different programs that were
13 available to people, whether it was welfare programs, whether
14 it was health programs, recreation programs. There was --
15 whatever was current at the time for what would be available
16 to the public and especially either the working public or the
17 poor -- poor people out there, that they could access various
18 programs that were available for them for help.

19 Q Okay. Representative Rohrer, is he in the local
20 area?

21 A Yes, he is. Yes, sir. He is directly -- he
22 butts right up against my district. He has - - -

23 Q Representative -- I'm sorry?

24 A He has one of the richest areas in the state,
25 Wyomissing. More millionaires per square block there than

1 anywhere.

2 Q Representative Argal, A-R-G-A-L, is he local?

3 A Yes. Yes, he is.

4 Q Representative Miller, Sheila Miller?

5 A Yes. Very good friend of mine.

6 Q What's this local cable channel that you have
7 here that your material appears on?

8 A Currently? You mean present - - -

9 Q During this period of time.

10 A Right now?

11 Q Yeah.

12 A It would be Berks Cable. It's now taken over by
13 Time Warner and somebody else just purchased them.

14 Q Okay. And is that a single channel - - -

15 A Oh, no, no.

16 Q - - - or do they have more than one channel?

17 A Oh, yeah. It's multiple channels. About a
18 hundred channels.

19 Q Oh, I'm sorry. That was a very poorly phrased
20 question that I sent us off on this. We'll start again.

21 A Certainly.

22 Q The cable channel which airs your program - - -

23 A Oh, TV 51.

24 Q - - - tell me about that cable channel.

25 A TV 51 I would presume we're talking about now?

1 Q I'm sorry?

2 A TV 51 - - -

3 Q Right.

4 A - - - the one we're talking about.

5 Q No, I'm talking now about the Berks Cable.

6 A Berks Cable channel. They're headquartered in

7 Reading. They have their own studios, by the way. They do

8 air all of these programs that we've discussed here today.

9 Q Right.

10 A They do accept tapes, similar to 51. It's a

11 for-profit cable enterprise. And they play -- they play my

12 show every month also.

13 Q Is this the same cable channel that does, for

14 example, half hour shows for the fire department and the

15 police department in Reading or do you know whether it's a

16 different cable channel, they have more than one?

17 A They -- they have an access channel that they

18 provide public access to for elected officials and shows. And

19 then there's another dedicated channel, that's -- that's like

20 the people's channel and operates out of Seventh and Penn

21 Streets. And that's a not-for-profit. And they also do a lot

22 of public shows.

23 Q Okay. Different subject.

24 A Yes, sir.

25 Q I'd asked you about the television shows that

1 you watched and you mentioned that you watch the news and I
2 asked you -- and I think you gave me a couple of Philadelphia
3 stations?

4 A Yes, sir.

5 Q Okay. Do the news assignment editors, et
6 cetera, in Philadelphia, share this same kind of egalitarian
7 approach to their status in the world vis-a-vis Reading as you
8 just described for carriage of political material?

9 A No.

10 Q They do not?

11 A They do not. Not to the best of my knowledge.

12 Q All right. Now, then is it true that when you
13 are looking for local breaking news coverage of Reading, that
14 you see it on the Philadelphia stations?

15 A If there's some major significance the
16 Philadelphia stations will cover it. Normally, today, Channel
17 5, which is operated out of Berks Cable TV, Channel 69, which
18 is operated out of Allentown, they're for pay, for profit TV
19 stations, they have full-time crews that cover the news and
20 they have dedicated news channels on our cable network.
21 Sometimes Channel 8 out of Lancaster will cover stories in
22 Berks County. Very seldom does Channel 6 out of Philadelphia
23 or Channel 10 or Channel 3 cover much of Berks County news.
24 Once in a great while if it's a major story. But they have a
25 major market share, I might add, - - -

1 Q Yeah.

2 A - - - those Philadelphia stations. I mean, they
3 are very heavy in this area. I mean, as far as coverage, of
4 their signals and their viewing programs.

5 MR. BECHTEL: It's been a privilege to have
6 dialogue with you, sir. Thank you.

7 THE WITNESS: And you, sir. I've enjoyed it.

8 MR. HUTTON: Thank you very much.

9 (Whereupon, the deposition concluded at 3:55
10 o'clock p.m.)

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1 I have reviewed my deposition and it is true and
2 correct except for any corrections noted on the attached
3 Errata Sheet, which I have also signed.

4
5
6
7 DATE: _____

8
9
10
11 _____
12 Thomas Caltagirone

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25

I, Rachelle D. Hirneisen, the officer before whom the deposition of THOMAS CALTAGIRONE was taken, do hereby certify that THOMAS CALTAGIRONE, the witness whose testimony appears in the foregoing deposition, was duly sworn by me on October 21, 1999, and that the transcribed deposition of said witness is a true record of the testimony given by him; that the proceedings are herein recorded fully and accurately to the best of my ability; that I am neither attorney nor counsel for, nor related to any of the parties to the action in which this deposition was taken; and, further, that I am not a relative of any attorney or counsel employed by the parties hereto or financially interested in this action.

Rachelle D. Hirneisen, RMR

Notary Public in and for
the Commonwealth of Pennsylvania

My Commission expires October 2, 2000

BERKS COURT REPORTING SERVICE



Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re Applications of)	MM Docket No. 99-153
)	
READING BROADCASTING, INC.)	File No. BRCT-940407KF
)	
For Renewal of License of)	
Station WTVE(TV), Channel 51)	
Reading, Pennsylvania)	
)	
and)	
)	
ADAMS COMMUNICATIONS CORPORATION)	File No. BPCT-9406301K
)	
For Construction Permit for a New)	
Television Station to Operate on)	
Channel 51, Reading, Pennsylvania)	

RECEIVED

SEP 28 1999

FEDERAL COMMUNICATIONS COMMISSION
SECRETARY

To: Magalie Roman Salas, Secretary
for direction to
The Honorable Richard L. Sippel
Administrative Law Judge


NOTICE BY ADAMS OF DEPOSITION
UPON ORAL EXAMINATION

Adams Communications Corporation ("Adams") gives notice of its intent to take the deposition of Tom Caltigirone, 127 S. 10th Street, Reading, PA 19601, upon oral examination on Thursday, October 21, 1999, commencing at 3 p.m. at the Comfort Inn, 2200 Stacy Drive, Reading, PA. We anticipate the deposition will be concluded within one hour. This is one of several depositions being taken during the period Wednesday, October 20, 1999, through Saturday, October 23, 1999. If the date and time cannot be accommodated, please contact Simone Parrish at 202-833-4190 collect, who will make an effort to revise the schedule to accommodate you. The subject of the deposition is your knowledge of programming and operations of station WTVE, channel 51, during the period August 1, 1989 through July 31, 1994. The deposition



will be taken before a court reporter.

Respectfully submitted,


Gene A. Bechtel
Harry F. Cole

Bechtel & Cole, Chartered
Suite 250, 1901 L Street, N.W.
Washington, D.C. 20036
Telephone 202-833-4190
Telecopier 202-833-3084

Counsel for Adams Communications
Corporation

September 28, 1999

CERTIFICATE OF SERVICE

I certify that I have this 28th day of September 1999 caused copies of the foregoing NOTICE BY ADAMS OF DEPOSITION UPON ORAL EXAMINATION to be hand delivered to the offices of the following:

The Hon. Richard L. Sippel
Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

James Shook, Esq.
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Thomas J. Hutton, Esq.
Holland & Knight, L.L.P.
Suite 200, 2000 K Street, N.W.
Washington, D.C. 20006
Counsel for Reading Broadcasting, Inc.

A handwritten signature in black ink, appearing to read "Simone Parrish", is written over a horizontal line.

Simone Parrish
Legal Assistant

SUBPOENA

ORIGINAL - To be executed by the person who effects service and returned to the Secretary of the Commission.

UNITED STATES OF AMERICA

FEDERAL COMMUNICATIONS COMMISSION

IN THE MATTER OF
READING BROADCASTING, INC.

For Renewal of License for

Station WTVE(TV), Channel 51,

Reading, Pennsylvania

MM Docket No. 99-153

THE PRESIDENT OF THE UNITED STATES OF AMERICA

To Tom Caltigirone, 127 S. 10th Street, Reading, PA 19601 GREETINGS:

YOU ARE HEREBY ORDERED under penalty of law to appear before the Federal Communications Commission or

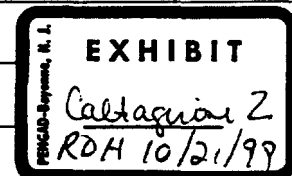
any duly authorized notary public at the Comfort Inn, 2200 Stacy Drive
(Name and official title of person authorized to take depositions)

in the city of Reading, PA on the 21st day of October, 19 99,

at 3 o'clock P. M., of that day, to testify in the above-captioned matter and to bring with you and to

produce then and there the following books, papers, and documents: See attached

READING EXHIBIT 33
PAGE 42



BY ORDER OF THE FEDERAL COMMUNICATIONS COMMISSION, this twenty-eighth day of
September, 19 99.

Richard L. Hyslop
(Official Title)

Administrative Law Judge

NOTICE: - Witness fees and mileage for attendance under this subpoena for service hereof are to be paid by the party at whose instance the witness is subpoenaed, and every copy of this summons for the witness must contain a copy of this notice.

Service of subpoenas may be made by any citizen of the United States over the age of 18 years who is competent to be a witness, and is not a party to or in any way interested in the proceeding.

PROOF OF SERVICE ON REVERSE SIDE.

FCC Form 766
October 1985

Attachment 1:
DOCUMENTS TO BE PRODUCED

All documents of any kind or description relating to the deponent's knowledge of or familiarity with the operations, including the programming, of Station WTVE(TV), Reading, Pennsylvania, during the period August 1, 1989 through July 31, 1994.

October 21, 1999

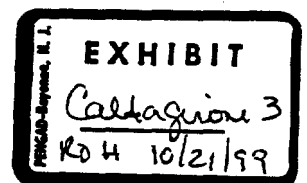
PROGRAMS/ISSUES REPORTS

3RD QUARTER 1989 - 3RD QUARTER 1994

WTVE-51
READING, PA

PENNSYLVANIA STATE REPRESENTATIVE
TOM CALTIGIRONE

READING EXHIBIT 33
PAGE 44



ISSUES AND PROGRAMS REPORT

FIRST QUARTER

1994

WTVE-TV51-TV 51

1729 NORTH ELEVENTH STREET

READING, PENNSYLVANIA 19604

COMPILED BY:

GEORGE MATTMILLER

WTVE TV51 CERTIFICATION OF AFFIDAVIT PERFORMANCE REPORT Page: 1

This is to certify that WTVE-TV51 aired the following announcements
at the dates and times shown below (times accurate within 15 minutes):

Title: LEGISLATIVE JOURNAL: REP CAL TAGIRONE Length: 29:18 Type: A-06

01/16/94
10:30:00

WTVE TV51 CERTIFICATION OF AFFIDAVIT PERFORMANCE REPORT Page: 1

This is to certify that WTVE-TV51 aired the following announcements
at the dates and times shown below (times accurate within 15 minutes):

Title: LEGISLATIVE JOURNAL: W/REP CALTAGIRONE Length: 29:00 Type: 2

03/13/94
10:30:00

ISSUES AND PROGRAMS REPORT
SECOND QUARTER
1994

WTVE-TV 51
1729 NORTH ELEVENTH STREET
READING, PENNSYLVANIA 19604

COMPILED BY:
GEORGE MATTMILLER

15). ISSUE: FAMILY

Children's Rights of Pennsylvania, Inc. - "Have You Seen Me?"

WTVE-TV 51 produces a weekly, ongoing series in conjunction with the Children's Rights of Pennsylvania, Inc. Entitled "Have You Seen Me", the station edits pictures and information which it receives from the Allentown office. The missing children are from around the United States, from infants through late teens. WTVE-TV 51 edits and scripts the one-minute segments.

"WIC"

This PSA entitled "WIC-20 years of WIC" is telling everyone about the success of WIC and how they are celebrating their 20th year anniversary. This program helps women, children and infants get the basic nutrients that they need to survive.

"Forgiveness"

The purpose of this PSA is to send a positive message to the public about families and to help promote a return to basic values. Forgiveness helps families to reinforce the importance of giving their children a sense of unconditional love.

16). ISSUE: GOVERNMENT

WTVE-TV 51 airs the following combination of one-hour and half-hour programs produced by the House Republican and House Democratic Broadcast Services as a public service in an effort to keep its viewers apprised of various government topics.

House of Democratic Broadcast Services

Title: Legislative Journal #93-216
Topic: Budget--Where to spend PA tax payer's money.
Guests: Representative Santoni

Democratic Broadcast Services

Title: Legislative Journal #92-284
Topic: Discussion of legislative issues on crime and juvenile probation.
Guests: Bruce Grim & Representative Caltagirone

House Republican Video

Title: State House Perspectives #239
Topic: Discussion on health insurance issues and how they affect society.
Guests: Eleanor Taylor, Chester County
Tom Ganan, Delaware County
Nick McKozie, Delaware County

House Republican Video

Title: Legislative Report #83-90
Topic: Discusses the PA Turnpike program
Guests: Representative Sam Rohrer

Democratic Broadcast Services

Title: Legislative Journal
Topic: Discussion on state-wide crime levels.
Guests: Representative Santoni

House Republican Video

Title: Legislative Report
Topic: Discussion on rising employment opportunities and a better looking economy.
Guests: Representative David Argall, Representative Pat Fleagle & Fred Sembach

Democratic Broadcast Services

Title: Legislative Journal E-38
Topic: Santoni discusses the budget.
Guests: Representative Santoni

House Republican Video

Title: Legislative Report
Topic: Discussion on prevailing wages.
Guests: Representative Sheila Miller, Representative Ron Marsico & Nevin Mindline

House Democratic Broadcast Services

Title: Legislative Journal #93-243
Topic: Update of events going on at the State Capitol
Guests: Representative Caltigirone

House Democratic Broadcast Services

Title: Agenda For Action #93-324
Topic: Discussion on programs for the Senior Citizens of PA
Guests: Representatives Mike Veon & Kevin Blaum

House Republican Video

Title: Legislative Report
Topic: Alcohol Abuse
Guests: Representative Sam Rohrer

House Republican Video

Title: Legislative Report
Topic: Discussion about crime and State Police
Guest: Col. Glen Walp, Maj. David Miller and
Representative Sam Rohrer

House Democratic Broadcast Services

Title: Legislative Journal
Topic: Discussion of the budget
Guests: Representative Santoni

House Republican Video

Title: Legislative Report
Topic: Charming Forge Historic Site
Guests: Representative Sheila Miller

House Democratic Broadcast Services

Title: Legislative Journal #92-209
Topic: Continuation of talks about Justic Larson
(impeachment)
Guests: Representative Caltigirone

House Republican Video

Title: State House #241
Topic: Discusses different levels of court and
upcoming trials
Guests: Tom Pyne

News To You - "Green Lights"

A news package style piece focusing on the Federal Government's new "Green Lights" program, a lobbying and instructional effort by the EPA to encourage private industry to install more energy efficient lighting facilities in its firms and to cut down on pollution (namely sulfur dioxide) caused by the production of this energy and its own expenses. The techniques to reduce energy

This is to certify that WTVE-TV51 aired the following announcements
 at the dates and times shown below (times accurate within 15 minutes):

Title: NATION'S UPDATE 1 Length: 4:00 Type: PSA

04/12/94	05/11/94	06/09/94
17:17:00	17:17:00	17:17:00
04/13/94	05/12/94	06/10/94
17:17:00	17:17:00	17:17:00
04/14/94	05/13/94	06/13/94
17:18:00	17:17:00	17:17:00
04/15/94	05/16/94	06/14/94
17:18:00	17:17:00	17:17:00
04/18/94	05/18/94	06/15/94
17:18:00	17:17:00	17:17:00
04/19/94	05/19/94	06/16/94
17:18:00	17:17:00	17:17:00
04/20/94	05/20/94	06/21/94
17:18:00	17:17:00	17:17:00
04/21/94	05/22/94	06/22/94
17:17:00	17:17:00	17:17:00
04/22/94	05/23/94	06/23/94
17:17:00	17:17:00	17:17:00
04/25/94	05/24/94	06/24/94
17:17:00	17:17:00	17:17:00
04/26/94	05/25/94	06/27/94
17:17:00	17:17:00	17:17:00
04/27/94	05/26/94	06/28/94
17:17:00	17:17:00	17:17:00
04/28/94	05/27/94	06/29/94
17:17:00	17:17:00	17:17:00
04/29/94	05/30/94	
17:17:00	17:17:00	
05/02/94	05/31/94	
17:17:00	17:17:00	
05/03/94	06/03/94	
17:17:00	17:17:00	
05/04/94	06/05/94	
17:17:00	17:17:00	
05/05/94	06/06/94	
17:17:00	17:17:00	
05/06/94	06/07/94	
17:17:00	17:17:00	
05/10/94	06/08/94	
17:17:00	17:17:00	

WTVE TV51 CERTIFICATION OF AFFIDAVIT PERFORMANCE REPORT Page: 1

This is to certify that WTVE-TV51 aired the following announcements
at the dates and times shown below (times accurate within 15 minutes):

Title: NATION'S UPDATE 2 Length: :90 Type: PSA

04/19/94	05/16/94	06/13/94
07:18:00	19:19:00	19:19:00
19:19:30	05/18/94	06/14/94
	19:19:00	19:19:00
04/21/94		
19:20:00	05/19/94	06/15/94
	19:19:00	19:19:00
04/22/94		
19:19:00	05/20/94	06/16/94
	19:19:00	19:19:00
04/25/94		
19:19:00	05/23/94	06/21/94
	19:19:00	19:19:00
04/26/94		
19:20:00	05/24/94	06/24/94
	19:19:00	19:20:00
04/27/94		
19:20:00	05/25/94	06/27/94
	19:19:00	19:20:00
04/28/94		
19:20:00	05/26/94	06/28/94
	19:19:00	19:19:00
04/29/94		
19:20:00	05/27/94	06/29/94
	19:19:00	19:19:00
04/30/94		
19:20:00	05/30/94	06/30/94
	19:19:00	19:19:00
05/01/94		
19:20:00	05/31/94	
	19:19:00	
05/02/94		
19:20:00	06/01/94	
	19:19:00	
05/03/94		
19:20:00	06/02/94	
	19:19:00	
05/04/94		
19:20:00	06/03/94	
	19:19:00	
05/05/94		
19:20:00	06/05/94	
	19:19:00	
05/06/94		
19:20:00	06/06/94	
	19:17:30	
05/10/94		
19:19:00	06/07/94	
	19:19:00	
05/11/94		
19:19:00	06/08/94	
	19:19:00	
05/12/94		
19:19:00	06/09/94	
	19:19:00	
05/13/94		
19:19:00	06/10/94	
	19:19:00	

North Eleventh Street

Reading, PA 19604

(215) 921-9181

fax (215) 921-9139

WTVE TV51 CERTIFICATION OF AFFIDAVIT PERFORMANCE REPORT Page: 1

This is to certify that WTVE-TV51 aired the following announcements
at the dates and times shown below (times accurate within 15 minutes):

Title: NATION'S UPDATE 3 Length: :90 Type: PSA

04/22/94	05/24/94	06/22/94
08:17:30	22:17:30	22:17:30
04/25/94	05/25/94	06/23/94
22:19:30	22:17:30	22:17:30
04/26/94	05/26/94	06/24/94
22:17:30	22:17:30	22:17:30
04/27/94	05/27/94	06/27/94
22:17:30	22:17:30	22:17:30
04/28/94	05/30/94	06/28/94
22:17:30	22:17:30	22:17:30
04/29/94	05/31/94	06/29/94
22:17:30	22:17:30	22:17:30
05/02/94	06/01/94	06/30/94
22:17:30	22:17:30	22:17:30
05/03/94	06/02/94	
22:17:30	22:17:30	
05/04/94	06/03/94	
22:17:30	22:17:30	
05/05/94	06/05/94	
22:17:30	22:17:30	
5/06/94	06/06/94	
22:17:30	22:19:30	
05/10/94	06/07/94	
22:17:30	22:17:30	
05/11/94	06/08/94	
22:17:30	22:17:30	
05/12/94	06/09/94	
22:17:30	22:17:30	
05/13/94	06/10/94	
22:17:30	22:17:30	
05/16/94	06/13/94	
22:17:30	22:17:30	
05/18/94	06/14/94	
22:17:30	22:17:30	
05/19/94	06/15/94	
22:17:30	22:17:30	
05/20/94	06/16/94	
22:17:30	22:17:30	
05/23/94	06/21/94	
22:17:30	22:17:30	

9 North Eleventh Street

Reading, PA 19604

(215) 921-9181

fax (215) 921-9139